

TOWNSEND & ASSOCIATES LLC.
ATTORNEYS AT LAW

FACSIMILE TRANSMITTAL SHEET

TO:	FROM:
Celeste P. Holpp, Esq.	Tyrone Townsend
COMPANY:	DATE:
Norman, Wood, Kendrick & Turner	3/30/2007
FAX NUMBER(205) 251-5479	TOTAL NO. OF PAGES INCLUDING COVER:
	9
PHONE NUMBER:	SENDER'S REFERENCE NUMBER:
(205) 259-1035	252-3999
RE: NOTICES OF DEPOSITION CHRISTOPHER BROWN LENAY MARTIN	YOUR REFERENCE NUMBER:

☐ URGENT ☒ FOR REVIEW ☐ PLEASE COMMENT ☒ PLEASE REPLY ☐ PLEASE RECYCLE

NOTES/COMMENTS:

Please review the attached Notices of Deposition, and contact me if you have any questions or concerns regarding this matter.

Thanks.

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334 SIXTH AVENUE SOUTH
BIRMINGHAM, ALABAMA 35205
205-252-3999



IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

SHYANDREA AND MARY
HESTER, et al.,

Plaintiffs,

v.

LOWNDES COUNTY COMMISSION,
CHRISTOPHER BROWN,
EMERGSTAT, DEPUTY JIMMY
HARRIS, et al.,

Defendants.

CIVIL ACTION NO.:
CV-06-572-WHA

NOTICE OF TAKING DEPOSITION

TO: Celeste P. Holpp, Esq.
NORMAN, WOOD, KENDRICK & TURNER
Financial Center - Suite 1600
505 20th Street North
Birmingham, Alabama 35203

You are hereby notified that the Plaintiffs, SHYANDREA AND MARY
HESTER, et al., will take the testimony by deposition of **CHRISTOPHER BROWN**,
upon oral examination for the purpose of discovery or for use as evidence in this cause,
or for both purposes, in accordance with the Alabama Rules of Civil Procedure, at the
offices of TOWNSEND & ASSOCIATES, LLC, 334 6th Avenue South, Birmingham, AL
35205, on **Friday, April 6th, 2007, at 1:00 p.m.**, before a court reporter, notary public, or
some other person authorized by law to administer oaths and take depositions. The

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examination will continue from day to day until completed. You are invited to attend and cross-examine.

Pursuant to Alabama Rules of Civil Procedure, notice is being given that the deponent is requested to produce at the time of the deposition, for inspection and copying the following documents or things:

1. Any and all reports, documents, other memoranda in Christopher Brown's possession involving the subjects, of this incident on May 28th, 2004.
2. A copy of the company policy and procedures manual, regarding the duties and procedures to be followed by Emergency Medical Technicians or Supervisors at Emergistat, Inc.

Respectfully submitted,

s/Tyrone Townsend

TYRONE TOWNSEND
Attorney for Plaintiffs
State Bar I.D. No.: ASB TOW006
P.O. Box 2105
Birmingham, Alabama 35201
Tel: (205) 252-3999
TTowns1@msn.com

OF COUNSEL:

James Earl Finley
Attorney at Law
P.O. Box 91
Trussville, Alabama 35173
Tel: (205) 655-9286
Fax: (205) 655-9287
E-mail: Finleylaw@finleylaw.com

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document on all counsel of record by placing a copy of the same in the U.S. mail, postage prepaid and properly addressed on this the 30th day of March, 2007, as follows:

Celeste P. Holpp, Esq.
NORMAN, WOOD, KENDRICK & TURNER
Financial Center - Suite 1600
505 20th Street North
Birmingham, Alabama 35203

Respectfully submitted,

s/Tyrone Townsend

TYRONE TOWNSEND
Attorney for Plaintiffs
State Bar I.D. No.: ASB TOW006
P.O. Box 2105
Birmingham, Alabama 35201
Tel: (205) 252-3999
TTownsl@msn.com

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
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SHYANDREA AND MARY
HESTER, et al.,

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NOTICE OF TAKING DEPOSITION

TO: Celeste P. Holpp, Esq.
NORMAN, WOOD, KENDRICK & TURNER
Financial Center - Suite 1600
505 20th Street North
Birmingham, Alabama 35203

You are hereby notified that the Plaintiffs, SHYANDREA AND MARY
HESTER, et al., will take the testimony by deposition of **LENAY MARTIN**, upon oral
examination for the purpose of discovery or for use as evidence in this cause, or for both
purposes, in accordance with the Alabama Rules of Civil Procedure, at the offices of
TOWNSEND & ASSOCIATES, LLC, 334 6th Avenue South, Birmingham, AL 35205,
on **Friday, April 6th, 2007, at 1:30 p.m.**, before a court reporter, notary public, or some
other person authorized by law to administer oaths and take depositions. The examination

rw

will continue from day to day until completed. You are invited to attend and cross-examine.

Pursuant to Alabama Rules of Civil Procedure, notice is being given that the deponent is requested to produce at the time of the deposition, for inspection and copying the following documents or things:

1. Any and all reports, documents, other memoranda in Lenay Martin's possession involving the subjects, of this incident on May 28th, 2004.
2. A copy of the company policy and procedures manual, regarding the duties and procedures to be followed by Emergency Medical Technicians or Supervisors at Emergistat, Inc.

Respectfully submitted,

s/Tyrone Townsend

TYRONE TOWNSEND
Attorney for Plaintiffs
State Bar I.D. No.: ASB TOW006
P.O. Box 2105
Birmingham, Alabama 35201
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OF COUNSEL:

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Attorney at Law
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Tel: (205) 655-9286
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E-mail: Finleyj@att.net

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document on all counsel of record by placing a copy of the same in the U.S. mail, postage prepaid and properly addressed on this the 29th day of March, 2007, as follows:

Celeste P. Holpp, Esq.
NORMAN, WOOD, KENDRICK & TURNER
Financial Center - Suite 1600
505 20th Street North
Birmingham, Alabama 35203

Respectfully submitted,

s/Tyrone Townsend

TYRONE TOWNSEND
Attorney for Plaintiffs
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P.O. Box 2105
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